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**IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

11 DOROTHY McKAY, DIANA
12 KILGORE, PHILLIP WILLMS,
13 FRED KOGEN, DAVID WEISS, and
THE CRPA FOUNDATION,
14 Plaintiffs

14 *Tammaris*,

15 | V.

16 SHERIFF SANDRA HUTCHENS,
17 individually and in her official
18 capacity as Sheriff of Orange County
19 California, ORANGE COUNTY
SHERIFF-CORONER
DEPARTMENT, COUNTY OF
ORANGE and DOES 1-10

20 Defendants

CASE NO: SACV 12-1458.JVS (JPRx)

**DECLARATION OF PHILLIP
WILLMS IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

Date: October 15, 2012
Time: 1:30 p.m.
Location: Ronald Reagan Federal
Building
411 West Fourth Street
Room 1053
Santa Ana, CA 92701
Courtroom: 10C
Judge: James V. Selna
Date Action Filed: September 5, 2012

DECLARATION OF PHILLIP WILLMS

1. I, Phillip Willms, submit this declaration in support of Plaintiffs' Motion for a Preliminary Injunction. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am a resident of Orange County, California and a United States Citizen over 21 years of age.

3. I am not prohibited under federal or California law from receiving or possessing firearms.

4. I practice shooting firearms regularly at my local shooting range and I belong to a club where I regularly engage in shooting competitions. As such, I am well versed in safe firearm handling procedures.

5. I often have expensive handguns that I transport unloaded and in locked containers for recreation and competition purposes.

16 6. I own a successful business in Orange County, California.

17 7. I own a handgun and would carry a handgun in public for self-defense on
18 occasions I deem appropriate, but do not do so because I fear prosecution since I
19 do not possess a valid license to publicly carry a handgun pursuant to California
20 Penal Code section 26150.

21 8. On or about November 1, 2011, I submitted to the Orange County
22 Sheriff's Department an official Department of Justice application for a license to
23 publicly carry a handgun. Exhibit "1" that is attached hereto is a true and correct
24 copy of the relevant pages of my completed application, which has been partially
25 redacted by the Orange County Sheriff's Department.

26 9. In my application to the Orange County Sheriff's Department for a
27 license to publicly carry a handgun, my asserted "good cause" was based upon self-
28 defense. Particularly, my asserted "good cause" was based upon my safety due to

1 expanding business sales, my handling of significant cash deposits, and protection
2 of myself while transporting my own expensive firearms to and from shooting
3 competitions. See Exhibit “1”.

4 10. On or about January 24, 2012, my application for a Carry License was
5 denied by the Orange County Sheriff's Department for lack of "good cause."
6 Exhibit "2" that is attached hereto is a true and correct copy of the letter I received
7 from the Orange County Sheriff's Department, which they have partially redacted.

8 11. In a letter dated February 22, 2012, I provided additional information in
9 support of my application for the license to publicly carry a handgun. Exhibit "3"
10 that is attached hereto is a true and correct copy of that letter.

11 12. On March 21, 2012, the Orange County Sheriff's Department again
12 denied my request for a license to publicly carry a handgun. Exhibit "4" that is
13 attached hereto is a true and correct copy of the second denial letter I received from
14 the Orange County Sheriff's Department.

I declare under penalty of perjury, under the laws of the United States and of
the state of California, that the foregoing is true and correct.

17 Executed in the United States on September 10, 2012.

Phillip Williams
Plaintiff